

WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET
MONTGOMERY, ALABAMA 36104
TEL. 334.265.1500

DANA H. BILLINGSLEY

dana@wilkinsonbryan.com

February 26, 2010

MAILING ADDRESS
POST OFFICE BOX 830
36101-0830
FAX 334.265.0319

Via Electronic Comment Filing System

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: Pine Belt Communications, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer
Proprietary Network Information (CPNI) Compliance Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Pine Belt Communications, Inc. (hereinafter, "Pine Belt Communications"), please find attached the annual CPNI Compliance Certification ("Certification") for Pine Belt Communications for the year 2009 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Pine Belt Communications has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at FCC@BCPIWEB.COM, as required under the Commission's Public Notice, DA 10-91 (released January 15, 2010).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley
Attorney for Pine Belt Communications, Inc.
Wilkinson & Bryan, P.C.
405 South Hull Street
Montgomery, Alabama 36104
Telephone: (334) 265-1500
Facsimile: (334) 265-0319
Email: dana@wilkinsonbryan.com

Enclosure

cc: John Nettles
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 18, 2010

Name of company covered by this certification: Pine Belt Communications, Inc.

Form 499 Filer ID: 801889

Name of signatory: John Nettles

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 10-91 (released January 15, 2010), Pine Belt Communications, Inc. states as follows:

I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in black ink, appearing to read "John Nettles", is written over a horizontal line.

Pine Belt Communications, Inc.

3984 County Rd. 32 - P.O. Box 279

Arlington, Alabama 36722

Phone (334) 385-2106

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
PINE BELT COMMUNICATIONS, INC.**

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Communications, Inc. (hereinafter, "Pine Belt Communications") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Pine Belt Communications:

1. I have personal knowledge that Pine Belt Communications has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Pine Belt Communications obtains written approval for the use of its customers' CPNI and that Pine Belt Communications has notified its customers of their right to restrict Pine Belt Communications' use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Pine Belt Communications has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Pine Belt Communications has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Pine Belt Communications implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Pine Belt Communications maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the

campaign, and what products and services were offered as part of the campaign. Pine Belt Communications retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Pine Belt Communications has established a supervisory review process regarding Pine Belt Communications' compliance with outbound marketing situations and that Pine Belt Communications maintains records of such compliance for a minimum period of one (1) year. Pine Belt Communications' sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Pine Belt Communications has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Pine Belt Communications, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Pine Belt Communications to enforcement action.

Executed on this 18th day of February, 2010.

PINE BELT COMMUNICATIONS, INC.

By:



John Nettles
President